



ICC CODES - PUBLIC COMMENT FORM

FOR PUBLIC COMMENTS ON THE "2008 REPORT
OF THE PUBLIC HEARINGS"

PLEASE SEE BACK OF FORM FOR PROCEDURES ON SUBMITTING PUBLIC COMMENTS. ALL SUBMITTALS MUST
COMPLY WITH THESE PROCEDURES.

CLOSING DATE: All Comments Must Be Received by June 9, 2008. The 2008 Final Action Hearings will be held
September 17-23, 2008 in Minneapolis, Minnesota

1) Please type or print clearly: Public comments will be returned if they contain unreadable information.

Name:	Ronald Majette				Date:	June 9, 2008
Jurisdiction/Company:	U.S. Department of Energy					
Submitted on Behalf of:	U.S. Department of Energy					
Address:	1000 Independence Avenue, EE-2J, IJ-018					
City:	Washington	State:	DC	Zip +4:	20585	
Phone:	202-586-7935	Ext:		Fax:	202 586-4617	
e-mail:	Ronald.Majette@ee.doe.gov					

2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at www.iccsafe.org. If you have previously executed the copyright release, please check the box below:

☒ 2007/2008 Cycle copyright release on file

3) Code Change Proposal Number:

Indicate the Code Change Proposal Number that is being addressed by this Public Comment: EC72, Parts I and II

4) Public Comment: The Final Action requested on this Code Change Proposal is: (Check Box)

<input checked="" type="checkbox"/> Approved as Submitted (AS):	<input type="checkbox"/> Approved as Modified by this Public Comment (AMPC):	<input type="checkbox"/> Approved as Modified by the Code Committee as Published in the ROH (AM):	<input type="checkbox"/> Approved as Modified by Assembly Floor Action as Published in the ROH (AMF):	<input type="checkbox"/> Disapproved (D):
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5) Proposed Modification (AMPC only):

6) Reason (State the reason and justification to support the Public Comment. Include a bibliography of any substantiating material. It is the responsibility of the commenter to make the material available at the Final Action Hearing):

This proposal will reduce duct leakage by eliminating the practice of using building cavities as return ducts. Simply put, using building cavities as ducts is a bad idea as these are too difficult to seal properly. The reason statement provided by the proponent of the original proposal (Chuck Murray) provides more support to this claim. Leaks in the return air system will senselessly waste energy for quite possibly the life of the building, up to 50 to 100 years.

The proponent asked for a negative vote on EC72 in the IECC at the code development hearings because EC71 addressed duct leakage and was approved. However, EC71 exempts buildings with ducts located inside the condition spaces from leakage testing requirements. The problem with this is that there still can be pathways through framing cavities to and through the building envelope even when the cavities used as returns are supposedly "inside". It may much more difficult to determine if a building cavity is truly inside the sealed building envelope than to make the same determination for a standalone duct (note the layers in the exterior components where sealing occurs may be different from where insulation is).